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Subject: PH Round 2 Report Review - HHRA
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Attachments: [Comments_Round 2_Draft122607_HHRA.doc](#)

Eric -

Here are my suggested revisions to the HHRA comments. There were some small comments up front that may just have been overlooked from Dana's last comments. They include my comments and my understanding of Dana's comments. Some comments (including one big one) got duplicated during revisions, and some may have been misplaced. I did most of this yesterday so I did not start from Jim's recent revisions. Where Jim and I offer different suggestions, you can decide. I hope I didn't make things harder by cutting out the HHRA comments from the rest of the comments (I wanted to work with a smaller document).

I looked more closely at the CSM. The LWG is more general in some areas, like including other regional sources, which we don't typically include. Also, the EPA 2005 CSM includes the air pathway, even though it is considered incomplete. I like to at least show that it was considered, so I prefer the prior EPA CSM. However, there were a few elements of the EPA CSM that confused me. I'm not sure about the "on-site worker", and whether we are really including that. We do not have any recreational beach user seeps, so that should be switched to incomplete. There should be a way of combining the various fish/shellfish exposure routes. And we'll need to add general occupational exposure to drinking water.

I apparently haven't looked closely at the CSM in awhile. We've agreed on the exposure scenarios as reflected in all the many exposure tables, but clearly we want the CSM to match the tables. Given that there may be some issues with the EPA CSM, but we don't want to go with the LWG CSM, you may want to add to the CSM comment and say that EPA will work with the LWG to revise and update the CSM to include new pathways (e.g., diver, residential/occupational drinking water).

I will be out on Friday, so I wanted to give my comments to you now. That way you have a chance to ask me to clarify. If you need to check with me on Friday, we can work something out.

- Mike